

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MALIBU MEDIA, LLC	:	
	:	
Plaintiff,	:	CIVIL ACTION
	:	
v.	:	NO.: 15-3237
	:	
ARTUR RENDA	:	
	:	
<u>Defendant.</u>	:	

DEFENDANT'S ANSWER TO PLAINTIFF'S COMPLAINT

Defendant, Artur Renda by and through his undersigned counsel, hereby Answers
Plaintiff's Complaint as follows:

NATURE OF THE ACTION

1. Denied.
2. Denied.
3. Denied.
4. Denied.

JURISDICTION AND VENUE

5. Admitted.
6. Denied.
7. Denied.
8. Admitted.

PARTIES

9. Denied.
10. Admitted.

FACTUAL BACKGROUND

11. Denied.
12. Denied.
13. Denied.
14. Denied.
15. Denied.
16. Denied.
17. Denied.
18. Denied.
19. Denied.
20. Denied.
21. Denied.
22. Denied.
23. Denied.
24. Denied.
25. Denied.
26. Denied.

MISCELLANEOUS

27. Denied.
28. Denied.

COUNT I

29. Defendant incorporates the allegations set forth above as if fully set forth herein.

30. Denied.

31. Denied.

32. Denied.

33(A)-(D). Denied.

34. Denied.

FIRST AFFIRMATIVE DEFENSE

35. Plaintiff's claims are barred for failing to state a claim upon which relief can be granted.

REQUEST FOR REIEF

WHEREFORE, Defendant respectfully requests judgment in his favor and against Plaintiff and for such other relief this Honorable Court deems just and appropriate.

Respectfully submitted,

/S/

GREGORY P. DiIPPO, ESQUIRE
Pizonka, Reilley, Bello & McGrory, P.C.
144 E. DeKalb Pike, Suite 300
King of Prussia, PA 19406
(610) 992-1300
EMAIL: gdipippo@pmrbm.com
Attorney for Defendant